



Chippewa Ottawa Resource Authority

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June 23, 2008

G. Vinson Hellwig, Chief
Air Quality Division
Michigan Department of Environmental Quality
525 West Allegan St.
P.O. Box 30260
Lansing, MI 48909

Re: Request for Comment Period on Four Permit to Install Applications.

Dear Mr. Hellwig,

The Chippewa Ottawa Resource Authority (CORA) is the regulatory authority for five federally recognized Tribes located in the 1836 Treaty ceded territories. We are requesting that the Michigan Department of Environmental Quality (DEQ) allow 180 days for our Tribes to adequately prepare comments on four Permit To Install Applications (State Registration Numbers B2840, B2357, N7863, M3792, N7867) pending for coal fired power plants and for future applications of air permits.

The CORA tribes are extremely concerned with the protection of Tribal and public health, and the Tribal property interests in natural resources located in the ceded territories from the known toxic emissions from coal fired power plants. Our ability to acquire and retain the technical, medical and legal expertise to assess the health impacts, the addition of toxins from air deposition to Great Lakes, inland water ways, and entire ecosystems that we are all a part of, will be materially impacted without the additional time requested to comment on air permits.

The health and welfare of our Tribal elders and children are especially vulnerable to coal fired power plant emissions and will be disproportionately affected if the air permits are issued by DEQ without adequate time to comment. Our Tribal Elders are our direct connection to seven generations past. They are the holders of our traditions and ways of life that are essential to the survival of our respective nations. Our children are our direct connection to seven generation in the future. We are charged with protecting their ability to fully enjoy our Treaty rights and to protect them from harmful emissions from coal fired power plants that are harmful to human health.

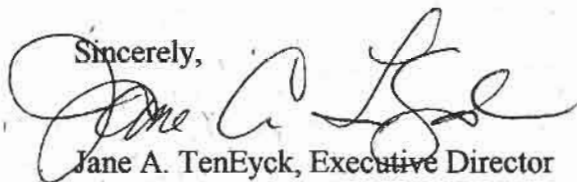
Under the Clean Air Act, the U.S. Environmental Protection Agency (EPA) establishes air quality standards to protect public health, including the health of sensitive populations such as people with asthma, children and older adults. EPA also sets limits to protect public welfare. This includes protecting ecosystems, including plants and animals, from harm, as well as protecting against decreased visibility and damage to crops, vegetation, and buildings. In spite of the recent U.S. Supreme Court ruling that the EPA must regulate carbon dioxide (CO₂) and mercury emissions from power plants, the EPA currently has no regulations in place to implement this responsibility. This failure of the EPA and DEQ to include CO₂ and mercury as regulated air pollutants leaves the most vulnerable members of our tribal populations at great risk. We need the additional 180 days to prepare comments to protect those of us who are most susceptible to the emissions from coal fired power plants.

CO₂ is a known greenhouse gas and a major contributor to climate change that impacts the Great Lakes and inland water ways; changes ecosystems beyond the experiences of our peoples and has the potential to forever change the very lands that we walk on.

The full exercise of our treaty rights will be compromised for generations if the additional mercury deposition from air emissions and mercury disposal in solid waste facilities from the proposed coal fired power plants. Mercury disposal in solid waste facilities will eventually leach into the ground waters that are already compromised. Additional mercury in our ecosystems could have a devastating impact on the health of tribal members who rely heavily on wild fish and game for their subsistence, as well as the economic livelihood of our commercial fishers.

An additional 180 day comment period will give us the opportunity to provide meaning input into this process that could impact our health and economies for generations. We believe the information and analysis that we could provide within this time frame would greatly aid the decision-making process.

Sincerely,



Jane A. TenEyck, Executive Director
CORA

Cc: Governor Jennifer M. Granholm, State of Michigan
Steven Chester, Director Michigan Department of Environmental Quality
Jack Barnette, Region V, EPA, Air and Radiation Division Chief